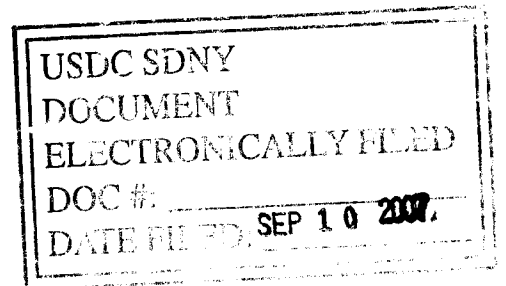


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
ANIBAL ABAD, :
:
Defendant. :
:
- - - - -X

INFORMATION

S1 07 Cr. 648 (LAK)



COUNT ONE

The United States Attorney charges:

1. From in or about 2005 through April 2007, in the Southern District of New York and elsewhere, ANIBAL ABAD, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Section 1956(a)(1)(B)(i) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that ANIBAL ABAD, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfer of tens of thousands of dollars in cash, represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that the

transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

COUNT TWO

The United States Attorney further charges:

3. From in or about 2005 through April 2007, in the Southern District of New York and elsewhere, ANIBAL ABAD, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

4. It was a part and object of the conspiracy that ANIBAL ABAD, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1) and 841(b)(1)(A) of Title 21 of the United States Code.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

5. As a result of committing the money laundering offense in violation of Title 18, United States Code, Section 1956, alleged in Count One of this Information, and committing the controlled substance offense alleged in Count Two of this Information, ANIBAL ABAD, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982 and 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this Information, including but not limited to a sum of money equal to approximately \$12.5 million in United States Currency, representing the amount of proceeds obtained as a result of the controlled substance offense for which the defendants are liable.

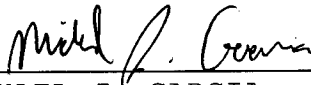
6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be subdivided without difficulty;
it is the intent of the United States, pursuant to 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956, and Title 21, United States Code, Sections 841(a)(1) and 853.)



MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ANIBAL ABAD,

Defendant

INFORMATION

S1 07 Cr. 648 (LAK)

(Title 18, United States Code,
Section 1956(h) and Title 21, United
States Code, Section 846.)

MICHAEL J. GARCIA
United States Attorney.
